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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

DECLARATION OF NAVEED SHAH

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I, Naveed A. Shah, declare as follows:

1. I am the Political Director of Common Defense Civic Engagement (Common Defense), a veteran-led nonprofit (501(c)(4)) organization. I make this declaration based on personal knowledge, information, and belief; if called as a witness could and would testify competently thereto.

2. I am a veteran of the United States Army, which I served as a Public Affairs Specialist. After four years and a 12-month tour in Iraq, I left active-duty service in 2010. I continued military service in the U.S. Army Reserve until March 2015. I began working for Common Defense in January 2019 as a Governmental Affairs Associate, and in October 2021, I was promoted to my current role as Political Director.

3. Common Defense is a grassroots membership organization of veterans, military families, and civilian supporters. We organize veterans and engage the military community to transform society by advocating for progressive policies that work for everyone. We educate our veterans on a variety of issues and train them to use their voices to leverage their experience in pursuit of policy changes.

4. In addition to providing education, community organizing and advocacy, Common Defense also offers our members assistance in obtaining benefits from the United States Department of Veterans Affairs (“VA” or “the Agency”).

5. Common Defense has a broad membership base of approximately 380,000 members nationwide, including 40,000 “Corps members” who are veterans. Corps members’ status as veterans has been verified, and they have attended one or more Common Defense events, taken a training class, or engaged with our organization about VA benefits.

6. Approximately 33,187 of Common Defense’s members live in California, including approximately 2,000 veterans.

7. Common Defense relies on publicly available data from the VA for some of its operations. For example, we recently consulted the Agency’s website to compare geographic

1 density of veteran populations with localized shortages of healthcare providers to determine
2 which areas are facing the most severe effects from proposed VA staffing cuts in terms of the
3 provision of healthcare.

4 8. From recent media reports, I learned that the VA has announced cutting about 15
5 percent of its workforce of 482,000, or from 70,000 to 80,000 employees, returning to the
6 Agency's 2019 staffing levels. In addition, I have read several media reports that the temporary
7 Department of Government Efficiency (DOGE) and the United States Office of Personnel
8 Management (OPM) are directing federal agencies to make staff cuts.¹

9 9. Several news outlets reported that a leaked VA memo detailed proposed cuts to
10 administrative and support staff; medical and healthcare support staff; regional and central
11 office staff; and reductions in field offices and/or call centers. For example, one article said the
12 VA proposed a timeline of four phases, with the first wave of layoffs and reassignments
13 beginning in July 2025 and continuing through September 2025.²

14 10. The allegedly leaked memo, a copy of which is attached, was later deemed
15 "fraudulent" by the VA through its press secretary. However, it has been widely reported that at
16 least 80,000 VA jobs are being reduced from its nationwide workforce.³ The March 4, 2025

17 ¹ Jory Heckman, *Lawmakers push back on VA's 'reckless' plan to cut about 80,000 positions*,
18 FEDERAL NEWS NETWORK (March 6, 2025), available at: [https://federalnewsnetwork.com/
veterans-affairs/2025/03/lawmakers-push-back-on-vas-reckless-plan-to-cut-about-80000-
positions/](https://federalnewsnetwork.com/veterans-affairs/2025/03/lawmakers-push-back-on-vas-reckless-plan-to-cut-about-80000-positions/); *Internal VA Memo Shows 80,000 Veterans Affairs Jobs to Be Cut: Impact on Veteran
Care*, MILITARY.NET (March 9, 2025), available at:

19 ² Alyssa Bethencourt, *As concerns among veterans rise, VA source shares details of workforce
20 reduction plan*, KTNV.COM (updated April 11, 2025), available at: [https://www.ktnv.com/news/as-
concerns-among-veterans-rise-va-gives-timeline-of-how-their-workforce-reduction-plan-will-
affect-them](https://www.ktnv.com/news/as-concerns-among-veterans-rise-va-gives-timeline-of-how-their-workforce-reduction-plan-will-affect-them)

21 ³ Stephen Groves, *Trump administration plans to cut 80,000 employees from Veterans Affairs,
22 according to internal memo*, APNEWS.COM (updated March 5, 2025), available at: [https://
apnews.com/article/veterans-affairs-cuts-doge-musk-trump-
f587a6bc3db6a460e9c357592e165712](https://apnews.com/article/veterans-affairs-cuts-doge-musk-trump-f587a6bc3db6a460e9c357592e165712); Jamie Rowen, *5 reasons federal cuts are hitting veterans
23 especially hard*, PBS.ORG (March 16, 2025), available at: [https://www.pbs.org/newshour/politics/
5-reasons-federal-cuts-are-hitting-veterans-especially-hard](https://www.pbs.org/newshour/politics/5-reasons-federal-cuts-are-hitting-veterans-especially-hard)

1 memo describes the VA's Reduction in Force (RIF) and Reorganization Plan (AARP) and
2 states that VA will "move out aggressively" in partnership with DOGE to effect an Agency-
3 wide RIF in August "to resize and tailor the workforce to the mission and revised structure."

4 11. The VA's previous termination of probationary employees harmed Common
5 Defense and its members, but the RIFs will cause much more harm of a vastly greater
6 magnitude. Military veterans comprise a large percentage of the federal workforce, and the
7 mass terminations will have a disproportionate effect on military veterans, through lost
8 employment as well as through disruption of services provided by the VA.

9 12. For example, when the VA fired between 2,000 and 3,000 probationary employees
10 in February, multiple Common Defense members reported to us that their VA services were
11 delayed or curtailed, and that they had difficulty communicating with health personnel and
12 scheduling medical appointments. One disabled veteran could not access therapy services and
13 instead had to go outside the VA system and pay out of pocket for needed care.

14 13. Another member reported to Common Defense that a VA employee who had
15 recently transitioned to working on the Veterans Crisis Line was terminated as part of the mass
16 firing of probationary employees. The Veterans Crisis Line provides emergency mental health
17 care—including crisis care and suicide prevention—for military veterans, service members,
18 their families, and caregivers, and is supposed to be available 24/7. Many of our members
19 have used the Veterans Crisis Line and rely on its availability to assist them if necessary. We
20 received communications from veterans with PTSD who were suffering additional stress
21 caused by the uncertainty of whether they will receive the support they need if they experience
22 a crisis.

23 14. The impact of the previous probationary terminations pales in significance
24 compared to the termination of 70,000 to 80,000 employees at the VA that we understand is
25 currently contemplated. My understanding is that the VA plans to terminate 30 to 40 times as
many employees as it did in February. This will be devastating to veterans across the United
States including our members.

1 15. Common Defense members have shared their fear and anxiety over the proposed
2 Agency cuts. As one explained, “VA layoffs directly affect me as many areas of the VA are
3 currently understaffed and wait times are already substantial for some services.”

4 16. The Agency’s 15 percent workforce reduction represents a terrible and
5 unprecedented blow to the community of veterans and their families who receive services
6 through the VA, including Common Defense members.

7 17. These terminations will severely strain, in many cases to the breaking point,
8 already understaffed veterans’ hospitals and other veterans’ services. The risk of severe
9 disruption remains the case whether the service providers are themselves terminated or
10 whether the terminations affect other employees, such as support staff. The loss of
11 probationary administrative staff means our members’ phone calls will go unanswered for
12 longer periods of time, and scheduling their vital medical appointments likely will be delayed.

13 18. The largest expansion of veterans benefits in a generation occurred with the
14 passage of the PACT Act of 2022.⁴ Among other things, the Act expanded and extended
15 eligibility for VA healthcare for veterans with toxic exposures to those who served in the
16 post-9/11 era, i.e. Iraq and Afghanistan, as well as in Vietnam and the Gulf War. Between
17 March 2023 and March 2024, the VA enrolled 400,000 veterans in its benefits system, 30
18 percent more than the previous year.⁵ Last year, the VA recorded its highest service levels in
19 history, reaching more than 9 million enrollees and delivering more than 127.5 million
20 healthcare appointments, according to Agency data.⁶

21 ⁴ 15 U.S.C. 376, otherwise known as the Sergeant First Class Health Robinson Honoring our
22 Promise to Address Comprehensive Toxics Act.

23 ⁵ Jamie Rowen, *5 reasons federal cuts are hitting veterans especially hard*, PBS.ORG (March 16,
24 2025), available at: [https://www.pbs.org/newshour/politics/5-reasons-federal-cuts-are-hitting-](https://www.pbs.org/newshour/politics/5-reasons-federal-cuts-are-hitting-veterans-especially-hard)
25 [veterans-especially-hard](https://www.pbs.org/newshour/politics/5-reasons-federal-cuts-are-hitting-veterans-especially-hard)

26 ⁶ Stephen Groves, *Trump administration plans to cut 80,000 employees from Veterans Affairs,*
27 *according to internal memo*, APNEWS.COM (updated March 5, 2025), available at: [https://](https://apnews.com/article/veterans-affairs-cuts-doge-musk-trump-f587a6bc3db6a460e9c357592e165712)
28 [apnews.com/article/veterans-affairs-cuts-doge-musk-trump-](https://apnews.com/article/veterans-affairs-cuts-doge-musk-trump-f587a6bc3db6a460e9c357592e165712)
29 [f587a6bc3db6a460e9c357592e165712](https://apnews.com/article/veterans-affairs-cuts-doge-musk-trump-f587a6bc3db6a460e9c357592e165712);

1 19. At a time when the VA is supposed to be giving veterans more access to services,
2 especially healthcare services, the RIFs will make it much more difficult for veterans to access
3 those services. It is simply not practical or feasible to return to staffing levels of six years ago
4 after expanding the Agency's services to an unprecedented level last year.

5 20. We anticipate that the VA's proposed cuts will cause a mass disruption in the
6 provision of the VA's services. It will become much harder for veterans to access the benefits
7 and care they have earned through their military service. It will become significantly more
8 difficult for veterans to make timely medical appointments; to obtain necessary medication; to
9 access educational benefits and pay tuition; and to maintain access to myriad services provided
by the VA.

10 21. The primary negative impact of additional layoffs at the VA will be a slowdown
11 and disruption in provision of medical care. I am most concerned with this disruption because
12 it will immediately affect the health and well-being of veterans who rely on the Agency for
ongoing medical needs.

13 22. The immediate effects that I anticipate are cancellation of medical appointments,
14 many of which are already significantly delayed by a month or longer, and cessation of
15 educational benefits that assist veterans with tuition payments. Loss of certain financial
16 benefits will cause members who rely on them to be unable to meet other basic needs such as
17 paying rent and buying groceries.

18 23. Common Defense recently began a fund-raising effort to provide its members with
19 small grants to support them financially as they cope with the fallout of mass terminations. We
20 will be devoting more of our time and resources to helping members absorb the disruptive
impact of Agency cuts.

21 24. As a result of diverting resources to fighting these cuts, Common Defense is
22 focusing less of its resources on its traditional organizing and education services.

23 25. For example, Common Defense recently dedicated part of an employee's time to
24 helping members with their VA benefits, which has not been part of the organization's
25

1 historical operations. Common Defense has been fielding an increasing number of calls and
2 inquiries from members anxious about how the cuts will affect them. Common Defense's team
3 of community organizers are spending more time answering these inquiries and less on their
4 typical work of outreach, recruitment, and organizing.

5 26. As a result of diverting resources to fighting these cuts, Common Defense is likely
6 to lose membership.

7 27. If the current plans for VA staff cuts were published in the Federal Register for
8 notice and comment, Common Defense would comment on those plans. If the plans are
9 otherwise made public, Common Defense will otherwise advocate against them.

10 28. Common Defense serves veterans, and we want to ensure that they lead long,
11 healthy lives. Combatting widespread VA staffing cuts is one of the ways we are trying to
12 achieve that goal and serve our organization's purpose.

13 I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and
14 correct.

15 Executed in Arlington, Virginia on April 25, 2025.

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17 Naveed Shah
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